

**DUNNINGTON**  
BARTHOLOW & MILLER LLP

ATTORNEYS AT LAW

230 Park Avenue, 21<sup>st</sup> Floor | New York, NY 10169 | Telephone: 212.682.8811 | [www.dunnington.com](http://www.dunnington.com) | [wdahill@dunnington.com](mailto:wdahill@dunnington.com)

**VIA ECF and Email**

The Hon. Analisa Torres, U.S.D.J.  
United States District for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007  
[Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

**Re: Milberg LLP v. Drawrah Limited et al 1:19-cv-04058-AT**

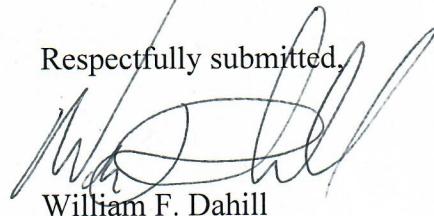
Dear Judge Torres:

We represent the Petitioner in the above-referenced matter. Pursuant to the Court's order of September 29, 2019 (ECF 37), Petitioner is filing herewith its Second Amended Petition and Proposed Order for the schedule for Petitioner's Motion for Summary Judgment.

A quick note concerning the proposed dates for briefing of Petitioner's Motion for Summary Judgment. Given the affidavits of service of the Petition filed by Petitioner on September 25, 2019, and the Wilk Auslander firm's appearance and agreement to accept service (ECF 38) for all Respondents other than Victoria Strategies Portfolio Ltd. ("VSP"), Petitioner need not serve its summary judgment papers through the Hague Convention. Petitioner also has served VSP with the Petition by Hague Convention. As to VSP, which had been represented by the Wilk Auslander firm since before the underlying arbitration, and which has the largest potential fee obligation to Petitioner among the Respondents, Petitioner will endeavor to find the most practical, proper way to serve it. The Wilk Auslander firm has stated that it does not know who represents VSP. We note that the H. Willy Brand, the "HWB" of the Respondent funds, was the sole representative for all Respondents, including VSP, throughout the entire relationship of the parties, including at the arbitration.

We also understand the Court's order encouraging the parties to "consolidate" the upcoming motions to mean the schedules should track each other. As I have advised Respondents' counsel, we are prepared to have their motion to dismiss track the same dates.

Respectfully submitted,



William F. Dahill

Cc: Counsel of Record (by ECF)  
Enclosures